

EXHIBIT A

State of New York - Department of State
Division of Corporations

Party Served:
PRET A MANGER (USA) LIMITED

Plaintiff/Petitioner:
ROBERTS, KEN

C/O DAVIS & GILBERT LLP
ATTN: CURT C. MYERS, ESQ.
1740 BROADWAY
NEW YORK, NY 10019

Dear Sir/Madam:

Enclosed herewith is a legal document which was served upon the Secretary of State on 12/27/2018 pursuant to SECTION 306 OF THE BUSINESS CORPORATION LAW.

This copy is being transmitted pursuant to such statute to the address provided for such purpose.

Very truly yours,
Division of Corporations

[Print in black ink all areas in bold letters. This summons must be served with a complaint.]
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

SUMMONS

KEN ROBERTS
[your name(s)] Plaintiff(s),
- against -

Index Number

101855/18

PRET A MANGER
[name(s) of party being sued] Defendant(s).

Date Index Number
Purchased

12-26-18

To the Person(s) Named as Defendant(s) above:

PLEASE TAKE NOTICE THAT YOU ARE SUMMONED to answer the complaint of the plaintiff(s) herein and to serve a copy of your answer on the plaintiff(s) at the address indicated below within 20 days after service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the Summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer, a judgment will be entered against you by default for the relief demanded in the complaint.

Dated: NEW YORK
COUNTY CLERK'S OFFICE
[date of summons]

DEC 26 2018

NOT COMPARED
WITH COPY FILE

[sign and print your name]

KEN ROBERTS

[your address(es), telephone number(s)]

47 Ft Washington Ave #4

NY, NY 10032 646-549-9420

Defendant(s) PRET A MANGER

853 Broadway (7th floor)

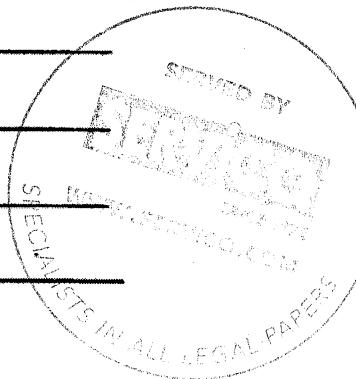
NY, NY 10003

[address(es) of party being sued]

Venue: Plaintiff(s) designate(s) New York County as the place of trial. The basis of this designation is:

[check box that applies]

- ☐ Plaintiff(s)' residence in New York County
- ☐ Defendant(s)' residence in New York County
- ☐ Other [See CPLR Article 5]:



SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF NEW YORK

Index No. 101855 /2018

Plaintiff,

KEN ROBERTS x

-Against-

COMPLAINT

Defendant,

PRET A MANGER x

TO THE SUPREME COURT OF THE STATE OF NEW YORK

The complaint of the plaintiff KEN ROBERTS, respectfully shows and alleges as follows:

PRELIMINARY STATEMENT:

Defendant is a corporation with about 90 retail stores in the US, 444 worldwide and \$200 million in sales in 2016. These retail stores sell food and beverages. Plaintiff applied for a job online, then met with 'Gia' for a face-to-face interview at 11 West 42 street NY, NY on Saturday, March 17 2018. Plaintiff was sent to a Pret store (located at 41st street and Lexington Ave with entrances at 122 42nd street and 380 Lexington Ave, NY, NY 10017, referred to as '41st and Lexington' or '41-Lex', in this complaint). The plaintiff was given an appointment notice with the store address, date and time along with the managers name (Rafael Burgos). On March 20 2018 at 10 am the plaintiff arrives at 41st and Lexington for the second face-to-face (in-store) interview. Plaintiff met with Rafael Burgos (store manager) at about 10 am. Plaintiff separates from Rafael Burgos at about 1030 am and works with employees (Fatima and Marcus) to learn about the store operations. At about 1230 pm the plaintiff meets with Rafael Burgos to review the day and exchange phone numbers. Rafael Burgos tells the plaintiff, "I will call you by 6pm with an answer"..
NEW YORK
COUNTY CLERK'S OFFICE

DEC 26 2018

NOT COMPARED
WITH COPY FILE

PARTIES

1. Defendant, Rafael Burgos, Pret store manager (41 and Lexington Ave).

FACTS

2. On Tuesday March 20, 2018 at about 11:30 am, Rafael Burgos (store manager, location 41-Lex) interviews the plaintiff then has a conversation with coworkers, including, Pedro, Paricio and Naomi in the back office, at 41-Lex, on a recorded device.
3. Rafael Burgos asks, "Did you see the new dude'?", "That's the hire.", "White dude".
4. Pedro asks, ".. he mad old, right?"
5. Rafael Burgos responds, "Yeah, bro."
6. Pedro asks, ".. so, he gonna be the barista?"
7. Rafael Burgos responds, "No, you see what I'm doing.", "We do what we do."
8. On Wednesday March 21, 2018 at 1:25 pm, the plaintiff calls Rafael Burgos at 917-378-8994 and introduces himself, "Rafael, This is Ken I interviewed yesterday". Rafael Burgos terminates the call. Plaintiff calls again and is directed to voicemail.

FIRST CAUSE OF ACTION AGAINST PRET A MANGER

RACE DISCRIMINATION (not less than 1 count)

violation of Title VII, Human Rights Act 1964,

NYSHRA and NYCHRA

(Item: 4)

SECOND CAUSE OF ACTION AGAINST PRET A MANGER

AGE DISCRIMINATION (not less than 1 count)


violation of Age Discrimination in Employment Act (ADEA) 1967,

NYSHRA and NYCHRA

(Item: 4)

WHEREFORE, plaintiff demands judgment against defendant in the sum of \$300,000 plus interest from March 21, 2018, costs and disbursements, together with any other relief the court finds to be just and proper.

Dated: DEC 26 2018



Signature
Ken Roberts

Plaintiff
47 Ft Washington Ste 4
New York, NY 10032
646-549-9420

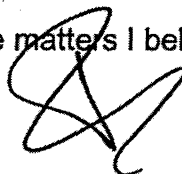
Address

VERIFICATION

Ken Roberts.

, being duly sworn, deposes and says:

I am the plaintiff in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters I believe them to be true.



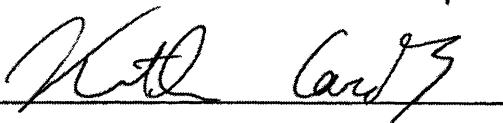
[sign your name in front of a Notary]

Ken Roberts.

[print your name]

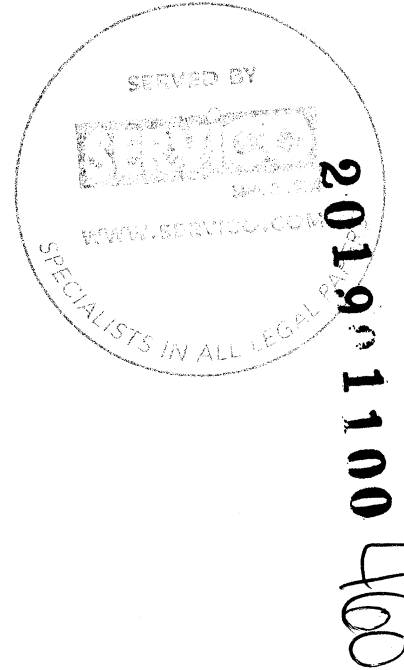
Sworn to before me this

26 day of December, 2018



Notary Public

Kenneth Cardez
Notary Public, State of New York
Reg No. 04CA6351839
Qualified in New York County
Commission Expires December 12, 2020



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